

LOMURRO, MUNSON, LLC

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Attorneys for Defendants Scalable Commerce, LLC, and National Data Analytics, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY
CORPORATION, as assignee of
individuals who are Covered
Persons, JANE DOE-1, a law
enforcement officer, JANE DOE-
2, law enforcement officer,
EDWIN MALDONADO, SCOTT
MALONEY, JUSTYNA MALONEY,
PATRICK COLLIGAN, PETER
ANDREYEV AND WILLIAM SULLIVAN,

Plaintiffs,

vs.

SCALABLE COMMERCE, LLC,
NATIONAL DATA ANALYTICS, LLC,
RICHARD ROES 1-10, fictitious
names of unknown individuals
and ABC COMPANIES 1-10,
fictitious names of unknown
entities,

Defendants.

Civil Action No. 2:24-cv-04160

**L.CIV.R. 6.1(b) CLERK'S
EXTENSION**

Pursuant to Local Civil Rule 6.1(b), Defendants Scalable Commerce, LLC and National Data Analytics ("Defendants"), hereby applies for a Clerk's Order extending the time within which it may answer, move, or otherwise reply to the Complaint filed by Plaintiffs by fourteen (14) days and represent that:

1. No previous extension has been obtained in this removed

matter;

2. This case was timely removed from the Superior Court of New Jersey, Bergen County on March 25, 2024 (ECF No. 1); and
3. Pursuant to Federal Rule of Civil Procedure 81 (c)(2)(C), Defendants' time to answer, move, or otherwise respond to the Complaint expires on April 1, 2024.
4. If granted, Defendants' deadline to file a responsive pleading will now be April 15, 2024.

Respectfully submitted,
LOMURRO, MUNSON, LLC
Attorneys for Defendants
Scalable Commerce, LLC and
National Data Analytics

By: s/Eric H. Lubin, Esq.
Eric H. Lubin, Esq.

Dated: March 28, 2024

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PROPOSED ORDER

The Application of Defendants Scalable Commerce, LLC and National Data Analytics ("Defendants") for an Extension of Time to Answer, Move or Otherwise Respond to Plaintiffs' Complaint is GRANTED. The new time to answer, move or otherwise respond to the Complaint is extended by fourteen (14) days up to and including April 15, 2024.

ORDER WILLIAM T. WALSH, Clerk By: _____

Deputy Clerk

